

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

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In re: : Chapter 7
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Honors Holdings, LLC, : Case No. 24-44875 (ESS)
:
Debtor. :
:
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**ORDER APPROVING THE MOTION OF WHITEHORSE
CAPITAL MANAGEMENT, LLC FOR ENTRY OF AN ORDER
PURSUANT TO 11 U.S.C. §§ 105 AND 362(d) AUTHORIZING RELIEF
FROM THE AUTOMATIC STAY (I) TO TERMINATE THE
TRANSITION SERVICES AGREEMENT AND (II) PERMITTING CFH
AND ITS AFFILIATES TO ADMINISTER CERTAIN BANK ACCOUNTS**

The Court, having considered the *Motion of WhiteHorse Capital Management, LLC, For Entry of an Order Pursuant to 11 U.S.C. §§ 105 and 362(d) Authorizing Relief from the Automatic Stay (I) To Terminate the Transition Services Agreement and (II) Permitting CFH and its Affiliates to Administer Certain Bank Accounts* (the “Motion”) and finding good cause therefor, hereby ORDERS as follows:

1. The automatic stay, to the extent applicable, is hereby modified and annulled, to the extent necessary, pursuant to section 362(d) of the Bankruptcy Code,
 - (i) permitting WhiteHorse, Camarillo and their affiliates to terminate the TSA³ including:
 - (a) to provide a Transferred Employee who shall have access to the bank accounts of Aiken and Spartanburg and who is permitted to transfer any and all cash held by

³ Capitalized terms used and not otherwise defined herein shall have the meaning given in the Motion.

Aiken and Spartanburg, all of which is the property of CFH and its affiliates, to CFH and its affiliates,

(b) to cease requesting services with respect to the HQ Lease and permitting CFH or its affiliates to enter into a new agreement with the HQ Landlord,

(c) to cease requesting services with respect to the agreement with Oracle and permitting CFH or its affiliates to enter into a new agreement with Oracle, and

(d) immediately thereafter to terminate the TSA with respect to the Debtor and the Excluded Entities, including Aiken and Spartanburg with respect to the provision of Buyer Provided Services and the Aiken and Spartanburg Transferred Employees, and

(ii) permitting CFH or its affiliates to fully administer the bank accounts owned by CFH and its affiliates and accessible for administrative convenience through the Debtor's account portal at JPM, who shall have access to their bank accounts in such portal.

2. The fourteen-day stay of an order granting relief from the automatic stay pursuant to Bankruptcy Rule 4001(a)(3) is waived.

3. This Court may retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2025

SO ORDERED

Honorable Elizabeth S. Stong
United States Bankruptcy Judge